

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

RUMEYSA OZTURK, )  
Petitioner, ) Case No. 1:25-cv-10695  
v. )  
PATRICIA HYDE, Field Office Director, )  
MICHAEL KROL, HSI New England Special )  
Agent in Charge, TODD LYONS, Acting Director )  
U.S. Immigrations and Customs Enforcement, )  
and KRISTI NOEM, Secretary of Homeland )  
Security )  
Respondents. )  
\_\_\_\_\_  
)

**INTRODUCTION**

1. Rumeysa Ozturk is a Turkish national in valid F-1 student status. Her date of birth is  
[REDACTED] 1994. She was unlawfully detained by DHS on March 25, 2025.
2. Accordingly, to vindicate Petitioner's constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.
3. Petitioner asks this Court to find that she was unlawfully detained and order her release.

**JURISDICTION**

4. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question).
5. Venue is proper because Petitioner resides and was detained in Sommerville, MA, and on information and belief is detained in the District of Massachusetts.

## **PARTIES AND FACTS ALLEGED**

6. The Petitioner Rumeysa Ozturk is a PhD student at Tufts University. She resides in Somerville, Massachusetts.
7. Respondent Patricia Hyde is the New England Field Office Director for U.S. Immigration and Customs Enforcement.
8. Respondent Michael Krol is the New England Special Agent in Charge for Homeland Security Investigations for U.S. Immigration and Customs Enforcement.
9. Respondent Todd Lyons is the Acting Director for U.S. Immigration and Customs Enforcement.
10. Respondent Kristi Noem is the Secretary of Homeland Security.
11. Petitioner is a Turkish national in valid F-1 student status. On information and belief, she was detained without cause near her residence by U.S. Immigration and Customs Enforcement agents on March 25, 2025, at about 5:30 p.m.
12. On information and belief, Petitioner is currently in custody in the District of Massachusetts, and one or more of the Respondents is her immediate custodian.

## **CLAIMS FOR RELIEF**

### **COUNT ONE Violation of Fifth Amendment Right to Due Process**

1. On information and belief, Petitioner is currently being arrested and detained by federal agents without cause and in violation of her constitutional rights to due process of law.

## **PRAYER FOR RELIEF**

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Order that Petitioner shall not be transferred outside the District of Massachusetts;

- (3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.
- (4) Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment.
- (5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.
- (6) Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/ Mahsa Khanbabai  
Mahsa Khanbabai (BBO #639803)  
115 Main Street, Suite 1B  
North Easton, MA 02356  
[Mahsa@mk-immigration.com](mailto:Mahsa@mk-immigration.com)  
508-297-2065

*Counsel for Petitioner*

Dated: March 25, 2025